

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL SIX)

Docket No. RM2020-13

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE MOTION FOR
ISSUANCE OF AN INFORMATION REQUEST
(November 2, 2020)

Earlier today, November 2, 2020, the Public Representative filed a confidential motion for issuance of an information request under seal. The confidential motion included proposed questions, as well as a brief explanation of the purpose of the proposed questions. The Postal Service takes no view on the merits of the motion, but offers the following observation.

As best the Postal Service can determine, the Public Representative filed his pleading under seal because several of the proposed questions relate to a database filed under seal with the Postal Service's original submission in this docket. The Postal Service filed that material under seal because it included facility-specific information of the type routinely shielded because of its commercial sensitivity. Reviewing the proposed questions, however, it does not appear that any of facility-specific data would be disclosed if the questions were posed in a public document. Nor does it appear as if any other type of sensitive information is implicated. Moreover, it appears that any potential response would likely not involve facility-specific information either.

The Postal Service greatly appreciates the caution which the Public Representative has observed when handling the Postal Service's commercially-sensitive information. As a general proposition, it certainly seems reasonable to err on

the side of caution regarding these matters. Nevertheless, shielding questions and answers using the established procedures comes with some cost of administrative convenience, as well as transparency. Under the specific circumstances presented by the instant motion, the Postal Service believes that the proposed questions could safely be posed and answered in public documents (although the Postal Service would naturally have to reevaluate any answers once they are actually drafted to ensure that conclusion continues to hold with respect to responses).

Consequently, if the Commission might be inclined to include some or all of the proposed questions in a forthcoming Information Request, it may wish to assess the status of those questions in light of this response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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